

BRIAN J. STRETCH (CABN 163973)  
United States Attorney

DAVID R. CALLAWAY (CABN 121782)  
Chief, Criminal Division

ARVON J. PERTEET (CABN 242828)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-6598  
FAX: (415) 436-7234  
Arvon.Perteet@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CV 12-03567 MEJ
	)	
Plaintiff,	)	<b>STIPULATION TO DISMISS ACTION</b>
	)	<b>PURSUANT TO RULE 41(a)(1)(A)(ii)</b>
v.	)	
	)	
REAL PROPERTY AND IMPROVEMENTS	)	
LOCATED AT 1840 EMBARCADERO,	)	
OAKLAND, CALIFORNIA,	)	
	)	
Defendant.	)	

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and by the signatures of their counsel hereunder, plaintiff United States of America and claimants, Ana Chretien, Summit Bank, Patients Mutual Assistance Collective Corporation ("PMACC"), Cornelia Crunseith, Frank Knighten, Atour Jason David, Desiree Monique Firl ("Claimants") hereby submit this stipulation to dismiss the government's Verified Complaint for Forfeiture with prejudice. Claimants will and hereby do release the United States of America, its agencies, agents, and officers, including employees and agents of the Drug Enforcement Administration ("DEA"), from any and all claims, actions or liabilities arising out of or related to this civil forfeiture action, including, without limitation, any claim for attorneys' fees, cost or interest which may be asserted on behalf of Claimants against the United States, whether pursuant to

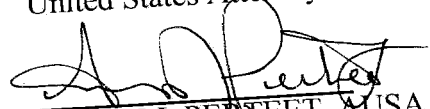
STIP DISMISSAL  
CV 12-03567 MEJ

1 28 U.S.C. § 2465 or otherwise. Claimants further agree to waive all appellate rights if any, related to  
2 this civil action.

3 This stipulation shall not be deemed to affect any rights or claims of Claimants as against each  
4 other.

5 Dated: April 27, 2016

BRIAN J. STRETCH  
United States Attorney

  
ARVON J. PERREET, AUSA  
Attorney for Plaintiff,  
United States of America

10 Dated: April \_\_, 2016

HENRY G. WYKOWSKI  
Attorney for Claimant PMACC

12 Dated: April \_\_, 2016

STEPHEN R. DEANGELO  
for Claimant PMACC

15 Dated: April \_\_, 2016

JOSEPH ELFORD  
Attorney for Patient Claimants

18 Dated: April \_\_, 2016

CORNELIA CRUNSETH  
Patient Claimant

20 Dated: April \_\_, 2016

FRANK KNIGHTEN  
Patient Claimant

23 Dated: April \_\_, 2016

ATOIR JASON DAVID  
Patient Claimant

25 Dated: April \_\_, 2016

DESIREE MONIQUE FIRL  
Patient Claimant

1 28 U.S.C. § 2465 or otherwise. Claimants further agree to waive all appellate rights if any, related to  
2 this civil action.


3 This stipulation shall not be deemed to affect any rights or claims of Claimants as against each  
4 other.

5 Dated: April 27, 2016

BRIAN J. STRETCH  
United States Attorney

7  
8 ARVON J. PERTEET, AUSA  
Attorney for Plaintiff,  
United States of America

9  
10 Dated: April 27, 2016

  
HENRY G. WTKOWSKI  
Attorney for Claimant PMACC

11  
12 Dated: April 29, 2016

  
STEPHEN R. DEANGELO  
for Claimant PMACC

13  
14  
15 Dated: May 9, 2016

  
JOSEPH ELFORD  
Attorney for Patient Claimants

16  
17  
18 Dated: April \_\_, 2016

CORNELIA CRUNSETH  
Patient Claimant

19  
20 Dated: April \_\_, 2016

FRANK KNIGHTEN  
Patient Claimant

21  
22  
23 Dated: April \_\_, 2016

ATOIR JASON DAVID  
Patient Claimant

24  
25 Dated: April \_\_, 2016

DESIREE MONIQUE FURL  
Patient Claimant

26  
27  
28  
STIP DISMISSAL  
CV 12-03567 MEJ

1 28 U.S.C. § 2465 or otherwise. Claimants further agree to waive all appellate rights if any, related to  
2 this civil action.

3 This stipulation shall not be deemed to affect any rights or claims of Claimants as against each  
4 other.

5 Dated: April 27, 2016

BRIAN J. STRETCH  
United States Attorney

7  
8 ARVON J. PERTEET, AUSA  
Attorney for Plaintiff,  
United States of America

10 Dated: April \_\_, 2016

HENRY G. WYKOWSKI  
Attorney for Claimant PMACC

12 Dated: April \_\_, 2016

STEPHEN R. DEANGELO  
for Claimant PMACC

15 Dated: April \_\_, 2016

JOSEPH ELFORD  
Attorney for Patient Claimants

18 Dated: April \_\_, 2016

Cornelia Crunse  
CORNELIA CRUNSETH  
Patient Claimant

20 Dated: April \_\_, 2016

FRANK KNIGHTEN  
Patient Claimant

23 Dated: April \_\_, 2016

ATOUR JASON DAVID  
Patient Claimant

25 Dated: April \_\_, 2016

DESIREE MONIQUE FIRL  
Patient Claimant

28  
STIP DISMISSAL  
CV 12-03567 MEJ

1 28 U.S.C. § 2465 or otherwise. Claimants further agree to waive all appellate rights if any, related to  
2 this civil action.

3 This stipulation shall not be deemed to affect any rights or claims of Claimants as against each  
4 other.

5 Dated: April 27, 2016

BRIAN J. STRETCH  
United States Attorney

7  
8 ARVON J. PERTEET, AUSA  
Attorney for Plaintiff,  
United States of America

10 Dated: April \_\_, 2016

HENRY G. WYKOWSKI  
Attorney for Claimant PMACC

12 Dated: April \_\_, 2016

STEPHEN R. DEANGELO  
for Claimant PMACC


15 Dated: April \_\_, 2016

JOSEPH ELFORD  
Attorney for Patient Claimants

18 Dated: April \_\_, 2016

CORNELIA CRUNSETH  
Patient Claimant

20 Dated: April \_\_, 2016

  
FRANK KNIGHTEN  
Patient Claimant

23 Dated: April \_\_, 2016

ATOIR JASON DAVID  
Patient Claimant

25 Dated: April \_\_, 2016

DESIREE MONIQUE FIRL  
Patient Claimant

28  
STIP DISMISSAL  
CV 12-03567 MEJ

1 28 U.S.C. § 2465 or otherwise. Claimants further agree to waive all appellate rights if any, related to  
2 this civil action.

3 This stipulation shall not be deemed to affect any rights or claims of Claimants as against each  
4 other.

5 Dated: April 27, 2016

BRIAN J. STRETCH  
United States Attorney

7  
8 ARVON J. PERTEET, AUSA  
Attorney for Plaintiff,  
United States of America

10 Dated: April \_\_, 2016

HENRY G. WYKOWSKI  
Attorney for Claimant PMACC

12 Dated: April \_\_, 2016

13 STEPHEN R. DEANGELO  
for Claimant PMACC

15 Dated: April \_\_, 2016

16 JOSEPH ELFORD  
Attorney for Patient Claimants

18 Dated: April \_\_, 2016

19 CORNELIA CRUNSETH  
Patient Claimant

20 Dated: April \_\_, 2016

21 FRANK KNIGHTEN  
Patient Claimant

23 Dated: April \_\_, 2016

22   
ATOUR JASON DAVID  
Patient Claimant

25 Dated: April \_\_, 2016

26 DESIREE MONIQUE FIRL  
Patient Claimant

27  
28  
STIP DISMISSAL  
CV 12-03567 MEJ

1 28 U.S.C. § 2465 or otherwise. Claimants further agree to waive all appellate rights if any, related to  
2 this civil action.

3 This stipulation shall not be deemed to affect any rights or claims of Claimants as against each  
4 other.

5 Dated: April 27, 2016

BRIAN J. STRETCH  
United States Attorney

7  
8 ARVON J. PERTEET, AUSA  
Attorney for Plaintiff,  
United States of America

10 Dated: April \_\_, 2016

HENRY G. WYKOWSKI  
Attorney for Claimant PMACC

12 Dated: April \_\_, 2016

STEPHEN R. DEANGELO  
for Claimant PMACC

15 Dated: April \_\_, 2016

JOSEPH ELFORD  
Attorney for Patient Claimants

18 Dated: April \_\_, 2016

CORNELIA CRUNSETH  
Patient Claimant

20 Dated: April \_\_, 2016

FRANK KNIGHTEN  
Patient Claimant

23 Dated: April \_\_, 2016

ATOUR JASON DAVID  
Patient Claimant

25 Dated: April \_\_, 2016

  
DESIREE MONIQUE FIRL  
Patient Claimant

28  
STIP DISMISSAL  
CV 12-03567 MEJ

Dated: April 1, 2016

STEVEN PISER  
Attorney for Claimant Summit Bank

Dated: April 20, 2016

Representative for Claimant Summit Bank

Dated: April 28, 2016

RICHARD TAMOR  
Attorney for Claimant Ana Chretien

Dated: April 14, 2016

ANA CHRETIEN  
Claimant Property Property Owner



1 Dated: <sup>MAY 6</sup> April \_\_, 2016

  
STEVEN PISER  
Attorney for Claimant Summit Bank

2  
3  
4 Dated: <sup>MAY 3</sup> April \_\_, 2016

  
Representative for Claimant Summit Bank

5  
6  
7 Dated: April \_\_, 2016

RICHARD TAMOR  
Attorney for Claimant Ana Chretien

8  
9 Dated: April \_\_, 2016

ANA CHRETIEN  
Claimant Property Property Owner

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
STIP DISMISSAL  
CV 12-03567 MEJ